

EXHIBIT X

TALITHIA NEWSOME
UNITED STATES vs STATE OF GEORGIA

July 12, 2022

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 UNITED STATES OF AMERICA,

5 Plaintiff,
6 vs.

CIVIL ACTION NO.
1:16-CV-03088-ELR

7 STATE OF GEORGIA,
8 Defendant.

9 Videotaped deposition of TALITHIA NEWSOME, taken on
10 behalf of the Plaintiff, pursuant to Notice and
11 agreement of counsel, in accordance with the Federal
12 Rules of Civil Procedure, before Maureen S. Kreimer,
13 CCR, CRR, Notary Public, at 864 Broad Street, Augusta,
14 Georgia on July 12, 2022 between the hours of 9:15
15 a.m. and 6:47 p.m.

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1 A. If there was a question with the
2 superintendents, I would report questions out -- I
3 mean, address concerns with them, as well as the --
4 not that they're my supervisor, but if there are
5 questions or concerns, typically my first point of
6 contact would be the special ed directors in those
7 school systems.

8 Q. What about for the RESA, is there anyone who
9 you directly report to?

10 A. Any correspondences that I have, I report
11 back to Dr. Alexander.

12 Q. And what is Dr. Alexander's position again?

13 A. I'm going to say she's director of RESA.
14 But don't quote me on that one.

15 Q. Okay. Anyone else?

16 A. No.

17 Q. And would you also say Dr. Alexander is your
18 main point of contact for the RESA?

19 A. She is, yes. Oh, I'm sorry. I would add
20 another person. I report to, again, not my
21 supervisor, but I do report information back to GLRS
22 as well, and Lisa Hill would be my contact for GLRS.

23 Q. Okay. And what is Lisa Hill's position?

24 A. She is director for the GLRS program.

25 Q. And then what about for the Georgia

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1 Department of Education, is there anyone you report
2 to?

3 A. It would be Vickie Cleveland and LaKesha
4 Stevenson.

5 Q. And what are their positions?

6 A. LaKesha -- I mean, Vickie Cleveland is I
7 think a program specialist for the program, and I'm
8 not sure of Ms. Stevenson's title.

9 Q. Is there anyone else from the State
10 Department in the list?

11 A. I guess you would say the director, which
12 would be Wanda Lowe. If she needed something, we'd
13 report to her. And then the director for Federal
14 programs. And if you ask me her name, it just went
15 away.

16 Q. Okay. Is that Shaun Owen?

17 A. I was going to say I remember Shaun. But
18 yes, that's correct, Shaun Owen.

19 Q. Okay. And just curious if you're familiar
20 with any of these other individuals who work with the
21 State Department of Ed. Did you ever work with
22 Zelphine Smith-Dixon?

23 A. I did.

24 Q. Okay.

25 A. But I worked with her as special ed

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1 director.

2 Q. Oh, in your capacity as special ed.

3 A. Mm-hmm (affirmative).

4 Q. And did you ever work with Nakiba Rahmig?

5 A. Not directly, no.

6 Q. So then I guess returning back to Vickie
7 Cleveland and LaKesha Stevenson --

8 A. Mm-hmm (affirmative).

9 Q. -- what do your -- what's the nature of your
10 communications with them?

11 A. They are our point of contact if we had any
12 questions or concerns at the State level. They
13 coordinate meetings to talk about initiatives or
14 programs, budgeting, changes, policies, procedures and
15 provide updates regarding the GNETS program
16 specifically. They also keep us up-to-date about any
17 changes that's going on in special ed at the State
18 level.

19 Q. Do you have any regularly scheduled meetings
20 with them?

21 A. The answer is yes, but some of them have
22 gotten cancelled. Typically, we'll get a calendar at
23 the beginning of the year that we'll go ahead and
24 schedule the monthly meetings. And my understanding
25 is prior to that they did have regular monthly

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1 meetings with the GNETS directors, and then the GNETS
2 scheduled meetings as well.

3 Q. What's the difference between the two?

4 A. So I'm not really sure because I hadn't
5 really participated in the second meeting, but my
6 understanding is that the GNETS meetings with the
7 State Department, they schedule those.

8 The meetings with the GNETS directors might
9 be just kind of like an advisory or support kind of
10 group where we can talk about issues among ourselves,
11 kind of brainstorm about how to deal with different
12 types of issues that might be going on, special
13 programs that one director might have used and want to
14 share that; collaborative planning for professional
15 learning, like I think we just did something on how do
16 we get our staff scheduled to do LSCI training, there
17 are only a few people in the State who can do that,
18 what's the best time to kind of get those things done.

19 Q. So for the first meetings you described,
20 these monthly meetings, it sounds like those are
21 facilitated by the State; is that correct?

22 A. It is, yes.

23 Q. Okay. And are those held in person,
24 virtually?

25 A. I got the unique experience of only